

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS

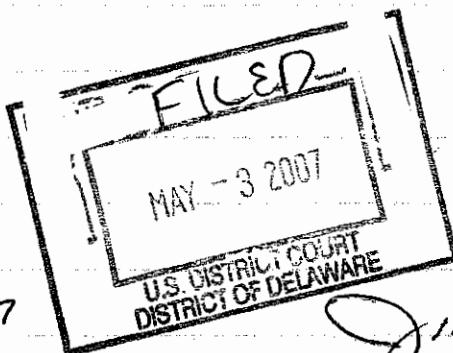
v.

CA. NO. 05-013 (gms)

RAPHAEL WILLIAMS, ET AL

MOTION FOR DISCOVERY # 2  
FOR DEFENDANTS RAPHAEL WILLIAMS  
AND TITOMAS L. CARROL PURSUANT  
TO FED R.CIV P#S 26 AND 34

DATE: 4/27/07



Jimmie Lewis  
SB# 506622

DEL. CORR. CENTER

1181 PADDICK RD  
SMYRNA, DEL 19977

- 1.) DEFENDANT RAPHAEL WILLIAMS PROVIDE COPIES OF ALL THE GRIEVANCES THE PLAINTIFF FILED WHILE HE WAS AT GANDER HILL A.K.A THE I.T.R.Y.C.I DATING FROM MAY 26, 2003 TO APRIL 7TH 2005.
- 2.) DEFENDANT THOMAS L. CARROL PROVIDE COPIES OF ALL THE GRIEVANCES THE PLAINTIFF FILED WHILE AT THE DEL. CORR. CENTER DATING FROM APRIL 7TH 07 TO APRIL 7TH 07
- 3.) DEFENDANT RAPHAEL WILLIAMS PROVIDE COPIES OF ALL THE HOUSING ASSIGNMENTS ASSIGNED TO THE PLAINTIFF WHILE HE WAS AT GANDER HILL DATING FROM MAY 26, 2003 TO APRIL 7TH 2005
- 4.) DEFENDANT THOMAS L. CARROL PROVIDE COPIES OF ALL THE HOUSING ASSIGNMENTS ASSIGNED TO THE PLAINTIFF WHILE CONFINED AT THE DEL. CORR. CENTER FROM APRIL 7TH 07 TO APRIL 20TH 07.

5.) DEFENDANT RAPHAEL WILLIAMS PROVIDE COPIES OF ALL THE DISCIPLINARY AND INCIDENT REPORTS REGARDING THE PLAINTIFF WHILE HE WAS AT GANDER HILL DATING FROM MAY 26, 03 TO APRIL 7TH 05.

6.) DEFENDANT THOMAS L CARROL PROVIDE COPIES OF ALL THE DISCIPLINARY AND INCIDENT REPORTS REGARDING THE PLAINTIFF AT THE DEL CORR CENTER DATING FROM APRIL 7TH 05 TO APRIL 20TH 07.

7.) DEFENDANT RAPHAEL WILLIAMS PROVIDE COPIES OF ALL THE MEDICAL RECORDS GENERATED REGARDING THE PLAINTIFF DURING HIS STAY AT THE ~~GANDER HILL PRISON~~ DATING FROM MAY 26, 03 TO APRIL 7TH 05.

8.) DEFENDANT THOMAS L. CARROL PROVIDE COPIES OF ALL THE MEDICAL RECORDS GENERATED REGARDING THE PLAINTIFF DURING HIS STAY AT THE DEL. CORR CENTER DATING FROM APRIL 7TH 05 TO APRIL 20TH 07

- 9.) DEFENDANT RAPHAEL WILLIAMS PROVIDE COPIES OF THE HOUSING UNIT LOG BOOK ENTRIES REGARDING THE PLAINTIFF AT GANDER HILL DATING FROM MAY 26, 03 TO APRIL 7TH 05.
- 10.) DEFENDANT THOMAS L. CARROL PROVIDE COPIES OF THE HOUSING UNIT LOG BOOK ENTRIES REGARDING THE PLAINTIFF AT THE DEL. CORR. CENTER DATING FROM APRIL 7TH 05, TO APRIL 20TH 07.
- 11.) DEFENDANT RAPHAEL WILLIAMS PROVIDE COPIES OF THE PLAINTIFF'S CLASSIFICATION FILE FROM GANDER HILL DATING FROM MAY 26, 03 TO APRIL 7TH 05.
- 12.) DEFENDANT THOMAS L. CARROL PROVIDE COPIES OF THE PLAINTIFF'S CLASSIFICATION FILE FROM THE DEL. CORR CENTER DATING FROM APRIL 7TH 05 TO APRIL 20TH 07.

13) DEFENDANT THOMAS L. CARROL PROVIDE ANY AND ALL VIDEO AND AUDIO SURVEILANCE RECORDINGS REGARDING THE PLAINTIFF AT THE DEL. CORR. CENTER DATING FROM APRIL 7TH 05 TO APRIL 20TH 07

14.) DEFENDANT RAPHAEL WILLIAMS PROVIDE ANY AND ALL VIDEO AND AUDIO SURVEILANCE RECORDINGS REGARDING THE PLAINTIFF AT THE H.R.Y.C.I DATING FROM MAY 26, 03 TO APRIL 7TH 05

15. DEFENDANT RAPHAEL WILLIAMS PROVIDE THE FULL AND CORRECT ADDRESSES OF THE FOLLOWING INMATE WITNESSES:

RONALD DAVIS SBI 346256, ROBERT GARRET SBI 486164,  
TIM REDDICK SBI 236669, TASHAWN EDWARDS SBI 439812,  
LIONEL NELSON SBI # 322140, THOMAS GREGG SBI # 249520,  
RAYMOND FARRARE SBI 498441, KEVIN HARDY SBI 258316.

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS  
DUE HEREBY CERTIFY ON THIS 27<sup>TH</sup>, DAY OF APRIL,  
2007, THE MOTION FOR DISCOVERY # 2 FOR  
DEFENDANTS RAPHAEL WILLIAMS AND  
THOMAS L. CARROL TO FED R. CIV P#S 26 AND 34  
BY U.S POSTAL; TO THE FOLLOWING:

CLERK OF THE COURT (GMS)  
UNITED STATES DISTRICT COURT  
844 N. KING ST, BOX 18  
WILMINGTON, DELAWARE 19801

ERIKA Y TROSS  
DEPUTY ATTORNEY GENERAL  
820 N. PENCOTT ST, 6TH FL  
WILMINGTON, DELAWARE 19801

DATE: 4/27/07

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